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The Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT

WESTERN DISTRICT OF WASHINGTON AT SEATTLE

JULIE DALESSIO, an individual,

v.  
Plaintiff,

UNIVERSITY OF WASHINGTON,

Defendant.

Case No. 2:17-cv-00642 MJP

Plaintiff's Fourth Interrogatories and  
Requests for Production to Defendant, UW

November 13, 2017

Pursuant to Federal Rules of Civil Procedure (FRCP), Plaintiff gives notice of incomplete responses and disclosures and requests that Defendant supplement insufficient responses.<sup>1</sup> **THIS IS ALSO A REQUEST FOR PRODUCTION, PURSUANT TO CIVIL RULE 34.**

I. REQUEST FOR SUPPLEMENTAL RESPONSES TO PREVIOUS  
INTERROGATORIES

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<sup>1</sup>Rule 26(e) SUPPLEMENTING DISCLOSURES AND RESPONSES.

(1) In General. A party who has made a disclosure under Rule 26(a)—or who has responded to an interrogatory, request for production, or request for admission—must supplement or correct its disclosure or response:  
(A) in a timely manner if the party learns that in some material respect the disclosure or response is incomplete or incorrect, and if the additional or corrective information has not otherwise been made known to the other parties during the discovery process or in writing;

## **PEFENDANT UNIVERSITY OF WASHINGTON'S INITIAL OBJECTION**

FRCP 33(a)(1) states “[u]nless otherwise stipulated or ordered by the court, a party may serve on any other party no more than 25 written interrogatories, including all discrete subparts. Plaintiff has conservatively served 24 interrogatories in her first two sets. Plaintiff has confirmed on two separate occasions that her “Third Set of Discovery”, which was sent in response to Defendant’s counsels request for a list of issues she wanted to discuss related to her first two sets of discovery, are not a new set of discovery requests. Therefore, those have not been counted in the 24 interrogatories already used. The following interrogatories are not supplemental responses to earlier interrogatories, but new interrogatories, each containing seven parts, in violation of the court rules. Plaintiff did originally ask Defendant to identify individuals who assisted in providing responses (Interrogatory Number 1), and specifically defined “identify” as “to describe and define with particularity.” Therefore, Defendant will respond to Number 1 (despite its seven subparts) but not the additional interrogatories as they are in violation of the court rules.

**A. The Defendant's identification of the following 21 individuals that have been disclosed is incomplete.**

Plaintiff requests that defendant please complete previous disclosures to include the person's title and employment classification, present business address and telephone number, all known email addresses, **his or her present employment position and location, and his or her employment position and location at the time in question.** For those who are no longer employed by UW, please also provide his or her residence address.

Plaintiff has attempted to fill in previously disclosed information, and highlighted deficiencies.

1. Alison Swenson, TITLE: Classification: Time in that Position:  
present employment position and location, and employment position and location at the time  
in question.c/o Keating, Bucklin & McCormack, Inc.

1           **RESPONSE: OBJECTION.** Vague (“time in question”). Without waiving said objection,  
2 the only relevant “time in question” is during the period between when the University of  
3 Washington provided responses to PRRs 15-00570 and 16-00760, and therefore  
4 Defendant’s response is for that time period. Defendant will supplement this answer.  
5

6           2. Perry Tapper  
7

8           Public Records Compliance Officer         Classification:         Time in that Position:  
9 present employment position and location and employment position and location at the  
time in question.

10           c/o Keating, Bucklin & McCormack, Inc  
11

12           **RESPONSE: OBJECTION.** Vague (“time in question”); Request violates FRCP 33(a)(1)  
13 limiting Plaintiff to 25 interrogatories including all discrete subparts. Defendant maintains  
14 the only relevant “time in question” is during the period between when the University of  
15 Washington provided responses to PRRs 15-00570 and 16-00760. Without waiving said  
16 objections, Defendant will supplement answer.  
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18           3. Eliza Saunders  
19

20           Director of the Office of Public Records         Classification:         Time in that Position:  
21 present employment position and location and employment position and location at the  
time in question.

22           Office of Public Records and Open Public Meetings  
23           c/o Keating, Bucklin & McCormack, Inc

1           **RESPONSE: OBJECTION.** Vague (“time in question”); Request violates FRCP 33(a)(1)  
2 limiting Plaintiff to 25 interrogatories including all discrete subparts. Defendant maintains  
3 the only relevant “time in question” is during the period between when the University of  
4 Washington provided responses to PRRs 15-00570 and 16-00760. Without waiving said  
5 objections, Defendant will supplement answer.  
6

7           4. Barb Benson     TITLE:                              Classification:                      Time in that Position:  
8 present employment position and location and employment position and location at the  
9 time in question.

10           Records Management Services

11           c/o Keating, Bucklin & McCormack, Inc.

12           **RESPONSE: OBJECTION.** Vague (“time in question”); Request violates FRCP 33(a)(1)  
13 limiting Plaintiff to 25 interrogatories including all discrete subparts. Defendant maintains  
14 the only relevant “time in question” is during the period between when the University of  
15 Washington provided responses to PRRs 15-00570 and 16-00760. Without waiving said  
16 objections, Defendant will supplement answer.

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20           5. Andrew Palmer     TITLE:                              Classification:                      Time in that Position:  
21 present employment position and location and employment position and location at the  
22 time in question.

23           c/o Keating, Bucklin & McCormack, Inc., P.S.

**RESPONSE: OBJECTION.** Vague (“time in question”); Request violates FRCP 33(a)(1) limiting Plaintiff to 25 interrogatories including all discrete subparts. Defendant maintains the only relevant “time in question” is during the period between when the University of Washington provided responses to PRRs 15-00570 and 16-00760. Without waiving said objections, Defendant will supplement answer.

6. Lori Oliver      TITLE:                  Classification:                  Time in that Position:  
  
present employment position and location and employment position and location at the  
time in question.

c/o Keating, Bucklin & McCormack, Inc., P.S.

**RESPONSE: OBJECTION.** Vague (“time in question”); Request violates FRCP 33(a)(1) limiting Plaintiff to 25 interrogatories including all discrete subparts. Defendant maintains the only relevant “time in question” is during the period between when the University of Washington provided responses to PRRs 15-00570 and 16-00760. Without waiving said objections, Defendant will supplement answer.

7. Mindy Kornberg    TITLE:                              Classification:                      Time in that Position:  
present employment position and location and employment position and location at the  
time of application

c/o Keating, Bucklin & McCormick, Inc.

1           **RESPONSE: OBJECTION.** Vague (“time in question”); Request violates FRCP 33(a)(1)  
2 limiting Plaintiff to 25 interrogatories including all discrete subparts. Defendant maintains  
3 the only relevant “time in question” is during the period between when the University of  
4 Washington provided responses to PRRs 15-00570 and 16-00760. Without waiving said  
5 objections, Defendant will supplement answer.  
6

7           8. Cynthia Dold       TITLE:                              Classification:                      Time in that Position:  
8 present employment position and location and employment position and location at the  
9 time in question.

10           c/o Keating, Bucklin & McCormack, Inc.

11           **RESPONSE: OBJECTION.** Vague (“time in question”); Request violates FRCP 33(a)(1)  
12 limiting Plaintiff to 25 interrogatories including all discrete subparts. Defendant maintains  
13 the only relevant “time in question” is during the period between when the University of  
14 Washington provided responses to PRRs 15-00570 and 16-00760. Without waiving said  
15 objections, Defendant will supplement answer.

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18           9. Ana Marie Keeney, Human Resources Consultant, UW Medicine Human Resources

19           Classification:                              Time in that Position:

20           present business address and telephone number, all known email addresses. present  
21           employment position and location and employment position and location at the time in  
22           question.  
23

1           **RESPONSE: OBJECTION.** Vague (“time in question”); Relevance; Request violates  
2 FRCP 33(a)(1) limiting Plaintiff to 25 interrogatories including all discrete subparts.  
3 Defendant maintains the only relevant “time in question” is during the period between when  
4 the University of Washington provided responses to PRRs 15-00570 and 16-00760.  
5 Defendant also objects to requests for personal email addresses as irrelevant. Without  
6 waiving said objections, Defendant will supplement answer.  
7

8           10. Amy Robles, Public Records Program Manager, Legal and Business Affairs, UW

9           Medicine                         Classification:                         Time in that Position:  
10           present business address and telephone number, all known email addresses  
11           present employment position and location and employment position and location at the  
12 time in question.

13           **RESPONSE: OBJECTION.** Vague (“time in question”); Relevance; Request violates  
14 FRCP 33(a)(1) limiting Plaintiff to 25 interrogatories including all discrete subparts.  
15 Defendant maintains the only relevant “time in question” is during the period between  
16 when the University of Washington provided responses to PRRs 15-00570 and 16-00760.  
17 Defendant also objects to requests for personal email addresses as irrelevant. Without  
18 waiving said objections, Defendant will supplement answer.

19           11. Jeanie Miele, former Public Records Program Manager, Office of the Chief Health

20           System Officer, UW Medicine                         Classification:                         Time in that Position:  
21           present business address and telephone number, all known email addresses  
22

1 present employment position and location and employment position and location at the  
2 time in question.

3 **RESPONSE: OBJECTION.** Vague (“time in question”); Relevance; Request violates  
4 FRCP 33(a)(1) limiting Plaintiff to 25 interrogatories including all discrete subparts.  
5 Defendant maintains the only relevant “time in question” is during the period between when  
6 the University of Washington provided responses to PRRs 15-00570 and 16-00760.  
7 Defendant also objects to requests for personal email addresses as irrelevant. Without  
8 waiving said objections, Defendant will supplement answer.

9  
10 12. Cheryl Manekia, UW Payroll Client Services & Training Classification:

11 Time in that Position:

12 present business address and telephone number, all known email addresses

13 present employment position and location and employment position and location at the  
14 time in question.

15 **RESPONSE: OBJECTION.** Vague (“time in question”); Relevance; Request violates  
16 FRCP 33(a)(1) limiting Plaintiff to 25 interrogatories including all discrete subparts.  
17 Defendant maintains the only relevant “time in question” is during the period between  
18 when the University of Washington provided responses to PRRs 15-00570 and 16-00760.  
19 Defendant also objects to requests for personal email addresses as irrelevant. Without  
20 waiving said objections, Defendant will supplement answer.

13. Odessah Visitacion, Assistant to the Assistant Vice President & Office Manager,  
UW Medicine Human Resources. Classification: Time in that Position:  
present employment position and location and employment position and location at the  
time in question.

present business address and telephone number, all known email addresses

**RESPONSE: OBJECTION.** Vague (“time in question”); Request violates FRCP 33(a)(1) limiting Plaintiff to 25 interrogatories including all discrete subparts. Defendant maintains the only relevant “time in question” is during the period between when the University of Washington provided responses to PRRs 15-00570 and 16-00760. Without waiving said objections, Defendant will supplement answer.

14. Paola M. Quinones, former Assistant to the Vice President, VP Human Resources  
? Classification: Time in that Position: present employment position and  
location: 1 year at previous position, 11 months at the time of investigation

present business address and telephone number, all known email addresses

**RESPONSE: OBJECTION.** Vague (“time in question”); Relevance; Request violates FRCP 33(a)(1) limiting Plaintiff to 25 interrogatories including all discrete subparts. Defendant maintains the only relevant “time in question” is during the period between when the University of Washington provided responses to PRRs 15-00570 and 16-00760. Defendant also objects to requests for personal email addresses as irrelevant. Without waiving said objections, Defendant will supplement answer.

15. Matt Maria, Program Coordinator for Laboratory Medicine

Classification: Time in that Position: present employment position and location and employment position and location at the time in question.

present business address and telephone number, all known email addresses

**RESPONSE: OBJECTION.** Vague (“time in question”); Relevance; Request violates FRCP 33(a)(1) limiting Plaintiff to 25 interrogatories including all discrete subparts. Defendant maintains the only relevant “time in question” is during the period between when the University of Washington provided responses to PRRs 15-00570 and 16-00760. Defendant also objects to requests for personal email addresses as irrelevant. Without waiving said objections, Defendant will supplement answer.

16. Tamara Schmautz TITLE: Classification:

Time in that Position: present employment position and location and employment position and location at the time in question.

present business address and telephone number, all known email addresses

**RESPONSE: OBJECTION.** Vague (“time in question”); Relevance; Request violates FRCP 33(a)(1) limiting Plaintiff to 25 interrogatories including all discrete subparts.

Defendant maintains the only relevant “time in question” is during the period between when the University of Washington provided responses to PRRs 15-00570 and 16-00760.

Defendant also objects to requests for personal email addresses as irrelevant. Without waiving said objections, Defendant will supplement answer.

17. Steven Durant TITLE: Classification:

Time in that Position: present employment position and location and  
employment position and location at the time in question

present business address and telephone number, all known email addresses

**RESPONSE: OBJECTION.** Vague (“time in question”); Relevance; Request violates FRCP 33(a)(1) limiting Plaintiff to 25 interrogatories including all discrete subparts.

Defendant maintains the only relevant “time in question” is during the period between when the University of Washington provided responses to PRRs 15-00570 and 16-00760.

Defendant also objects to requests for personal email addresses as irrelevant. Without waiving said objections, Defendant will supplement answer.

18.      Larry Bell                    TITLE:                    Classification:

Time in that Position: present employment position and location and employment  
position and location at the time in question

present business address and telephone number, all known email addresses

**RESPONSE: OBJECTION.** Vague (“time in question”); Relevance; Request violates FRCP 33(a)(1) limiting Plaintiff to 25 interrogatories including all discrete subparts, and therefore a response will not be provided. Defendant maintains the only relevant “time in question” is during the period between when the University of Washington provided responses to PRRs 15-00570 and 16-00760. Defendant also objects to requests for personal email addresses as irrelevant. Without waiving said objections, Defendant will supplement answer.

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3 19. Sharon Risley, former assistant to Plaintiff's former supervisor TITLE:  
4 Classification: Time in that Position: present employment  
5 position and location and employment position and location at the time in question  
6 present business address and telephone number, all known email addresses

7 **RESPONSE: OBJECTION.** Vague ("time in question"); Relevance; Request violates  
8 FRCP 33(a)(1) limiting Plaintiff to 25 interrogatories including all discrete subparts.  
9 Defendant maintains the only relevant "time in question" is during the period between  
10 when the University of Washington provided responses to PRRs 15-00570 and 16-00760.  
11 Defendant also objects to requests for personal email addresses as irrelevant. Without  
12 waiving said objections, Defendant will supplement answer.

13  
14 20. Rhoda Ashley Morrow, Plaintiff's former supervisor TITLE:  
15 Classification: Time in that Position: present employment  
16 position and location and employment position and location at the time in question.  
17 present business address and telephone number, all known email addresses, present  
18 residence address

19 **RESPONSE: OBJECTION.** Vague ("time in question"); Relevance; Request violates  
20 FRCP 33(a)(1) limiting Plaintiff to 25 interrogatories including all discrete subparts.  
21 Defendant maintains the only relevant "time in question" is during the period between when  
22 the University of Washington provided responses to PRRs 15-00570 and 16-00760.  
23

1 Defendant also objects to requests for personal email addresses as irrelevant. Without  
2 waiving said objections, Defendant will supplement answer.  
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5 21. Karen Holloway, Associate Administrator, Department of Laboratory Medicine

6 TITLE: Classification: Time in that Position:

7 present employment position and location and employment position and location at the time in  
8 question  
9

10 c/o Keating, Bucklin & McCormack, Inc.

11 **RESPONSE: OBJECTION.** Vague (“time in question”); Request violates FRCP 33(a)(1)  
12 limiting Plaintiff to 25 interrogatories including all discrete subparts. Defendant maintains  
13 the only relevant “time in question” is during the period between when the University of  
14 Washington provided responses to PRRs 15-00570 and 16-00760. Without waiving said  
15 objections, Defendant will supplement answer.  
16

17 22. Patricia Van Velsir TITLE: Classification: Time  
18 in that Position: present employment position and location and employment position and  
19 location at the time in question present business  
20 address and telephone number, all known email addresses

21 **RESPONSE: OBJECTION.** Vague (“time in question”); Relevance; Request violates FRCP  
22 33(a)(1) limiting Plaintiff to 25 interrogatories including all discrete subparts. Defendant  
23 maintains the only relevant “time in question” is during the period between when the  
University of Washington provided responses to PRRs 15-00570 and 16-00760. Defendant

1 also objects to requests for personal email addresses as irrelevant. Without waiving said  
2 objections, Defendant will supplement answer.  
3

4 23. Cheryl Sternberg, TITLE: Classification:  
5 Time in that Position: present employment position and location and employment  
6 position and location at the time in question  
7 present business address and telephone number, all known email addresses

8 **RESPONSE: OBJECTION.** Vague (“time in question”); Relevance; Request violates  
9 FRCP 33(a)(1) limiting Plaintiff to 25 interrogatories including all discrete subparts.

10 Defendant maintains the only relevant “time in question” is during the period between when  
11 the University of Washington provided responses to PRRs 15-00570 and 16-00760.  
12 Defendant also objects to requests for personal email addresses as irrelevant. Without  
13 waiving said objections, Defendant will supplement answer.

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17 B. For each of the persons listed above, identify which, if any, have provided responses to which  
18 interrogatories and/or requests for production.

19 **RESPONSE: OBJECTION.** Not reasonably calculated to lead to the discovery of  
20 admissible evidence; relevance; Not Proportional to the Needs of the Case; Request violates  
21 FRCP 33(a)(1) limiting Plaintiff to 25 interrogatories including all discrete subparts.  
22 Without waiving the foregoing objections, Defendant will supplement answer.

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II. REQUESTS FOR PRODUCTION

- 2       1. Please produce the UW personnel file, including employee training records for each  
3           of the persons listed above.

4 **RESPONSE: OBJECTION.** Unduly burdensome; overly broad; not proportional to the needs of the  
case; relevance; harassing. Without waiving said objections, Defendant will supplement answer.

- 5       2. Please produce the organizational charts pertaining to each of the persons listed  
6           above.

7 **RESPONSE: OBJECTION.** Unduly burdensome; overly broad; not proportional to the needs of the  
case; relevance; harassing. The only potentially relevant office is the Office of Public Records.  
8 Without waiving said objections, and upon belief, the Office of Public Records does not have an  
organizational chart for this time period.

- 9       3. Please produce all public records pertaining to the Plaintiff that were provided by  
10           UW to Ludmilla Barbacar and/or other employees of the Washington State Human  
Rights Commission.

11 **RESPONSE: OBJECTION.** Relevance; Not Reasonably Calculated to Lead to the Discovery of  
Admissible Evidence; Vague (“provided”). Without waiving said objections, Defendant will  
supplement answer.

- 12       4. Please produce all public records pertaining to the Plaintiff that were provided by  
13           UW to EEOC investigators.

14 **RESPONSE: OBJECTION.** Relevance; Not Reasonably Calculated to Lead to the Discovery of  
Admissible Evidence; Vague (“provided”). Without waiving said objections, Defendant will  
supplement answer.

- 16       5. Please produce all public records pertaining to the Plaintiff that were provided by  
17           UW to Shari Spung.

18 **RESPONSE: OBJECTION.** Relevance; Not Reasonably Calculated to Lead to the Discovery of  
Admissible Evidence; Vague (“provided”); Privilege. Without waiving said objections, Defendant  
will supplement answer.

- 19       6. Please produce all public records pertaining to the Plaintiff that were provided by  
20           UW to any state or federal auditors.

21 **RESPONSE: OBJECTION.** Relevance; Not Reasonably Calculated to Lead to the Discovery of  
Admissible Evidence; Vague (“provided”); Not Proportional to the Needs of the Case; overbroad.  
Without waiving said objections, Defendant will supplement answer.

- 22       7. Please produce Plaintiff’s employee benefits file.

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2 **RESPONSE: OBJECTION.** Relevance; Not Reasonably Calculated to Lead to the Discovery of  
Admissible Evidence; Vague ("employee benefits file"). Without waiving said objections, Defendant  
will supplement answer.  
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Dated: November 13, 2017

9 Signed: s/ julie dalessio  
10  
11 Julie Dalessio  
110 29th Ave.  
Seattle, WA 98122  
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13 206 324 2590  
juliedalessio@msn.com  
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1 DECLARATION OF RESPONDING PARTY

2 I declare under the penalty of perjury under the laws of the State of Washington that I am the  
3 Defendant in this action OR I am the \_\_\_\_\_ of

4 \_\_\_\_\_ and am authorized to make the foregoing answers.

5 I declare that I have read the foregoing answers, know the contents thereof, and believe them  
6 to be true and correct.

7 Dated this \_\_\_\_\_ day of \_\_\_\_\_, 2017, at \_\_\_\_\_, Washington.

8 Name:

9 Address:

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